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February 14, 2002

Via Hand Delivery

The Honorable Benson Everett Legg
U.S. District Judge
United States District Court for the
District of Maryland
U.S. Court House, 101 W. Lombard Street
Baltimore, Maryland 21201

Re: Christopher J. Galuardi, M.D. v. Paul Revere Life Insurance Co., et al.
Civil Action No. L-01-3874

Dear Judge Legg:

As required by your Scheduling Order, counsel for the parties have conferred and have the following response on the subjects listed below:

1. Trial Before a U.S. Magistrate Judge.

The parties cannot agree to submit this matter for trial before a United States Magistrate Judge.

2. Discovery.

✓ (If discovery is necessary or permissible in this case, then the parties request that each side be allowed 20 hours for fact witness depositions. The Defendant believes that this matter may be governed by ERISA in which case it believes that no discovery would be permissible to either party. Plaintiff believes that ERISA does not govern this case and discovery is permissible.

3. Early Mediation.

Both parties are and will remain interested in any possibility of resolving this matter by mediation, but they are not at this time prepared to request an early mediation.

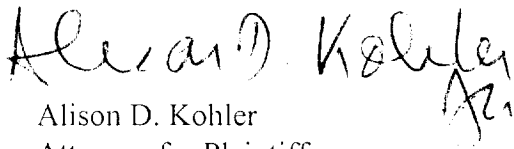
✓ By 3/15/02 counsel shall confer + report in writing how they propose this issue (does ERISA govern) should be resolved. Blegg 2/20/02
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Please let us know if you have any further questions.

Very truly yours,

Handwritten signature of Alison D. Kohler in black ink, featuring a stylized 'A' and 'K'.

Alison D. Kohler
Attorney for Plaintiff

Handwritten signature of J. Snowden Stanley, Jr. in black ink, featuring a stylized 'J' and 'S'.

J. Snowden Stanley, Jr.
Attorney for Defendants

JSS,Jr./cmw

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